

Mr. Walter B. Woodhams  
Woodcrest Manufacturing, Inc.  
P.O. Box 848  
Goshen, IN 46526

Re: 103-12741  
Significant Source Modification to:  
Part 70 permit No: 103-6060-00016

Dear Mr. Woodhams:

Woodcrest Manufacturing, Inc., was issued a Part 70 permit 103-6060-0016 on April 20, 1998 for stationary wood furniture manufacturing plant. An application to modify the source was received on September 20, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a)(9) One (1) dip coating tank, identified as EU-01O, utilized a dipping application system, coating crate chests with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.
- (a)(10) One (1) dip coating tank, identified as EU-01P, utilized a dipping application system, coating drawer fronts with a maximum capacity of 80 units per hour, and the emissions are fugitive.
- (b)(6) Line C-6 with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building, identified as BH-1.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(I), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of

this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Eric Goehl, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7891 to speak directly to Mr. Goehl. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

ERG/EG

cc: File - Miami  
U.S. EPA, Region V  
Miami County Health Department  
Air Compliance Section Inspector - Greg Wingstrom  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Woodcrest Manufacturing, Inc.  
217 East Canal Street  
Peru, Indiana 46970**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T103-6060-00016	
Issued by: Felicia R. George, Assistant Commissioner, Office of Air Management	Issuance Date: April 20, 1998

First Significant Permit Modification, SPM 039-11338-00011 issued on April 20, 2000

First Significant Source Modification No: SSM 103-12741-00016	Pages Affected: 2, 3, 4, 5, 6, 6a, 7, 20, 30, 30a, 31, 31a, 32, 33, 34, 35, 36, 36a, 37, 38, 45
Issued by:  Paul Dubenetzky, Chief Office of Air Management	Issuance Date:  Expiration Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1 (22)]

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The Permittee owns and operates a stationary wood furniture manufacturing plant.

Responsible Official: Walter B. Woodhams, President  
Source Address: 217 East Canal St., Peru, Indiana 46970  
Mailing Address: P.O. Box 848, Peru, Indiana 46970  
SIC Code: 2512  
County Location: Miami  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program Minor Source under PSD Rules  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

(a) The following surface coating equipment:

- (1) One (1) rail stain flowcoater, identified as EU-01G, coating wooden rails with a maximum capacity of 52.5 units per hour, and exhausting to Stack ID SVG.
- (2) One (1) rail spray booth, identified as EU-01H, utilizing an air assisted airless application system, coating wooden rails with a maximum capacity of 52.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVH.
- (3) One (1) frame stain flowcoater, identified as EU-01I, coating wooden frames with a maximum capacity of 87.5 units per hour, and exhausting to Stack ID SVI.
- (4) One (1) wipe down area, identified as EU-01N, with a maximum capacity of 87.5 units per hour, and exhausting to general ventilation.
- (5) One (1) frame sealer spray booth, identified as EU-01J, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVJ.
- (6) One (1) frame sealer spray booth, identified as EU-01K, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVK.
- (7) One (1) frame varnish spray booth, identified as EU-01L, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVL.

- (8) One (1) frame varnish spray booth, identified as EU-01M, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVM.
  - (9) One (1) dip coating tank, identified as EU-01O, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.
  - (10) One (1) dip coating tank, identified as EU-01P, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 80 units per hour, and the emissions are fugitive.
- (b) Woodworking operations consisting of the following:
- (1) Line C-1, with a maximum capacity of 5100 pounds per hour, which has emissions either controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1, or controlled by one (1) baghouse, identified as BH-2, exhausting to Stack ID BH-2.
  - (2) Line C-2, with a maximum capacity of 5146 pounds per hour, which has emissions controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.
  - (3) Line C-5, with a maximum capacity of 336 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1690, exhausting to general ventilation.
  - (4) Line 1735, with a maximum capacity of 4220 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1735, exhausting to general ventilation.
  - (5) Line 1689, with a maximum capacity of 5100 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1689, exhausting to general ventilation.
  - (6) Line C-6 with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building identified as BH-1.
- (c) One (1) wood-fired boiler, identified as EU-02, with a heat input capacity of 6.0 million Btu per hour, and exhausting to Stack ID D.

**A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]**

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This stationary source also includes the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

**A.4 Part 70 Permit Applicability [326 IAC 2-7-2]**

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);



- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations

and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit VOC and PM is limited to 246 tons each per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twentyfour (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 41-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

#### C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

#### C.7 Stack Height [326 IAC 1-7] (a)

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description:

- (a) The following surface coating equipment:
- (1) One (1) rail stain flowcoater, identified as EU-01G, coating wooden rails with a maximum capacity of 52.5 units per hour, and exhausting to Stack ID SVG.
  - (2) One (1) rail spray booth, identified as EU-01H, utilizing an air assisted airless application system, coating wooden rails with a maximum capacity of 52.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVH.
  - (3) One (1) frame stain flowcoater, identified as EU-01I, coating wooden frames with a maximum capacity of 87.5 units per hour, and exhausting to Stack ID SVI.
  - (4) One (1) wipe down area, identified as EU-01N, with a maximum capacity of 87.5 units per hour, and exhausting to general ventilation.
  - (5) One (1) frame sealer spray booth, identified as EU-01J, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVJ.
  - (6) One (1) frame sealer spray booth, identified as EU-01K, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVK.
  - (7) One (1) frame varnish spray booth, identified as EU-01L, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVL.
  - (8) One (1) frame varnish spray booth, identified as EU-01M, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVM.
  - (9) One (1) dip coating tank, identified as EU-01O, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.
  - (10) One (1) dip coating tank, identified as EU-01P, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 80 units per hour, and the emissions are fugitive.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements for New Facilities), the VOC emissions from the surface coating equipment EU-01G, EU-01H, EU-01I, EU-01N, EU-01J, EU-01K, EU-01L, and EU-01M shall be reduced using the best available control technology (BACT). Pursuant to PC (52) 1698, BACT is:

- (a) Using air assisted airless spray guns for surface coating.
- (b) That volatile organic compound emissions from the stain shall be limited to 6.8 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.
- (c) That volatile organic compound emissions from the sealer shall be limited to 5.8 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.
- (d) That volatile organic compound emissions from the varnish shall be limited to 5.3 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These

emissions shall be averaged on a daily basis.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied by emission units EU-01O and EU-01P to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

#### D.1.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total of all surface coating facilities (EU01G, EU-01H, EU-01I, EU-01J, EU-01K, EU-01L, and EU-01M, EU-01O, and EU-01P) shall use no more than 246 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOC to 246 tons of VOC per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the five (5) spray booths (EU-01H, EU-01J, EU-01K, EU-01L, and EU-01M) and one (1) wipe down area (EU-01N) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

- (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
- (D) Use a combination of (A), (B), and (C).

A copy of this rule is enclosed.

**D.1.6 Work Practice Standards [40 CFR 63.803]**

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The owner or operator of an affected source subject to this subpart shall prepare and maintain a

written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

#### D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and associated control devices.

### **Compliance Determination Requirements**

#### D.1.8 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-2.1.
- (b) If the OAM requests, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

#### D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer.

#### D.1.10 HAP Content

Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the compliance date specified in Condition D.1.5 and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

#### D.1.11 Particulate Matter (PM)

Pursuant to OP-52-06-92-0118, issued on September 6, 1988, and in order to comply with D.1.4, the dry filters for PM control shall be in operation at all times when the five (5) spray booths (EU-01H, EU-01J, EU-01K, EU-01L, and EU-01M) and one (1) wipe down area (EU-01N) are in operation.



## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.1.12 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.1.13 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limits and the VOC usage limits established in Conditions D.1.1 and D.1.3.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used, compliance shall be based on the volume weighted average VOC content of the coatings used for each day. The volume weighted average VOC content of the coatings shall be determined using the following equation:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [D * O * Q / [1 - W * Dc / Dw]]}{33}$$

- Dc = density of coating, lb/gal
- Dw = density of water, lb/gal
- O = weight percent organics, %
- Q = quantity of coating, gal/unit
- W = percent volume water, %
- C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each day;
  - (5) The total VOC usage for each day; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
- (1) Certified Product Data Sheet for each finishing material and thinner.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for each finishing material and thinner.
  - (3) The VHAP content in weight percent of each thinner used.
  - (4) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.1.12, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.14 Reporting Requirements

- (a) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used, a quarterly summary of the information described in Condition D.1.13(a)(3) to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (c) An Initial Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the compliance date of November 21, 1997. The initial compliance report must include data from the entire month that the compliance date falls.
- (d) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1, through June 30.
- (2) July 1, through December 31.

- (e) The reports required in (c) and (d) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch-Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description:

- (b) Woodworking operations consisting of the following:
- (1) Line C-1, with a maximum capacity of 5100 pounds per hour, which has emissions either controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1, or controlled by one (1) baghouse, identified as BH-2, exhausting to Stack ID BH-2.
  - (2) Line C-2, with a maximum capacity of 5146 pounds per hour, which has emissions controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.
  - (3) Line C-5, with a maximum capacity of 336 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1690, exhausting to general ventilation.
  - (4) Line 1735, with a maximum capacity of 4220 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1735, exhausting to general ventilation.
  - (5) Line 1689, with a maximum capacity of 5100 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1689, exhausting to general ventilation.
  - (6) Line C-6 with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building identified as BH-1.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through Stack ID BH-1 shall not exceed 18.9 pounds per hour when Line C-1 is operating at a process weight rate of 5100 pounds per hour, Line C-2 is operating at a process weight rate of 5146 pounds per hour and Line C-6 is operating at a process weight rate of 6304 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through Stack ID BH-2 shall not exceed 4.82 pounds per hour when Line C-1 is operating at a process weight rate of 5100 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1690 shall not exceed 1.24 pounds per hour when Line C-5 is operating at a process weight rate of 336 pounds per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1735 shall not exceed 6.76 pounds per hour when Line 1735 is operating at a process weight rate of 4220 pounds per hour.

- (e) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1689 shall not exceed 7.68 pounds per hour when Line 1689 is operating at a process weight rate of 5100 pounds per hour.
- (f) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse BH-1 shall not exceed 8.85 pounds per hour when Line C-6 is operating at a process weight rate of 6304 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

#### D.2.2 Opacity

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Pursuant to OP-52-06-92-0118, visible emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

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Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.5 Visible Emissions Notations

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- (a) Daily visible emission notations of the stack exhausts (BH-1 and BH-2) shall be performed during normal daylight operations when exhausted to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Preventive Maintenance Plan - Failure to Take Proper Steps, shall be considered a violation of this permit.

#### D.2.6 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### **D.2.7 Broken Bag or Failure Detection**

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions).

Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Responses Steps, shall be considered a violation of this permit.

#### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.2.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the stack exhausts (BH-1 and BH-2) and the baghouse exhausts (SP-1689, SP-1690, and SP-1735).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Woodcrest Manufacturing  
Source Address: 217 East Canal Street, Peru, Indiana 46970  
Mailing Address: P.O. Box 848, Peru, Indiana 46970  
Part 70 Permit No.: T103-6060-00016  
Administrative No.: AAT-103-10252-00016  
Facility: Facility-wide  
Parameter: VOC emissions  
Limit: 246 tons per 12-consecutive month period, rolled on a monthly basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



Mail to: Permit Administration & Development Section  
Office Of Air Management  
100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015

Woodcrest Manufacturing, Inc.  
P.O. Box 848  
Peru, Indiana 46250

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make  
these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Harlan Cabinets, Inc., Indiana 46743, has constructed the custom cabinet finishing facility in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on June 8, 2000 and as permitted pursuant to Permit Number 003-012349, Plant ID No. 003-00214.
5. Surface coating facilities were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of  
Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.  
My Commission expires: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name (typed or printed)

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Part 70 Significant Source Modification.**

#### **Source Background and Description**

Source Name:	Woodcrest Manufacturing, Inc.
Source Location:	217 East Canal Street, Peru, Indiana 46970
County:	Miami
SIC Code:	2512
Operation Permit No.:	T 103-6060-00016
Operation Permit Issuance Date:	April 20, 1998
Significant Source Modification No.:	SSM 103-12741-00016
Permit Reviewer:	ERG/EG

The Office of Air Management (OAM) has reviewed a modification application from Woodcrest Manufacturing, Inc., relating to the construction of the following emission units and pollution control devices:

- (a) The following surface coating equipment:
  - (9) One (1) dip coating tank, identified as EU-01O, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.
  - (10) One (1) dip coating tank, identified as EU-01P, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 80 units per hour, and the emissions are fugitive.
- (b) Woodworking operations consisting of the following:
  - (6) Line C-6 with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building identified as BH-1.

This significant source modification is to construct the above emissions units. The administrative amendment (AA-103-12913-00016) is for the operation of the new emission units.

#### **History**

On September 20, 2000, Woodcrest Manufacturing, Inc. submitted an application to the OAM requesting to add two dipping coating operations and another woodworking operation line. Woodcrest Manufacturing was issued a Part 70 permit on April 20, 1998.

#### **Existing Approvals**

The source has been operating under the following approvals:

- (a) AA 103-12466-00016, issued on August 3, 2000.

- (b) AA 103-10252-00016, issued on November 18, 1998.
- (c) T 103-6060-00016, issued in April 20, 1998.
- (d) OP 52-06-92-0118, issued on September 6, 1988.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SVN	crate chest dip coating EU-010	30	2	8,000	70
NA	Drawer fronts Dip coating EU-01P	-	-	--	ambient

### Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 20, 2000.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (3 pages).

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	12.3
PM-10	12.3
SO <sub>2</sub>	--
VOC	243.5
CO	--
NO <sub>x</sub>	--

HAP's	Potential To Emit (tons/year)
Xylene	8.3
Ethylbenzene	2.0
Toluene	2.0
Cumene	7.1
TOTAL	19.4

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2.7-10.5(f) as the modification has a potential to emit greater than twenty-five (25) tons per year of VOC.

### County Attainment Status

The source is located in Miami County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Miami County has been classified as attainment or unclassifiable for ozone. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 250
PM-10	less than 250
SO <sub>2</sub>	less than 250
VOC	less than 250
CO	less than 250
NO <sub>x</sub>	less than 250

- (a) The source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the TSD for Part 70 103-6060-00016.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
EU-01O	--	--	--	208.5	--	--	16.6
EU-01P	--	--	--	35.1	--	--	2.8
C-6 Woodworking	0.02	0.02	--	--	--	--	--
Total	0.02	0.02	--	243.6*	--	--	19.4
Source Wide Total	Less than 250	Less than 250	Less than 250	Less than 250	Less than 250	Less than 250	Greater than 25

\* Source wide limit less than 250 tons per year of VOC to remain a minor PSD source.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) The surface coating operation is subject to 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), because Woodcrest Manufacturing operates a major source as defined in 40 CFR Part 63.2. The compliance date for their existing source is November 21, 1997 because actual HAP emissions for the source were greater than 50 tons in 1996. Woodcrest Manufacturing

is going to use a volume weighted averaging method to meet the limit of 1.0 pound of VHAP per pound of solids for their surface coating operation.

### **State Rule Applicability - Surface Coating**

#### **326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)**

This modification is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) as the emission levels (15 pounds of VOC per day) in 326 IAC 8-2-1(a)(4) are expected to be exceeded. Pursuant to this rule, all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall be applied using one of the specified application systems. The use of dip and drain applications satisfies this requirement.

### **State Rule Applicability - Woodworking**

#### **326 IAC 6-3-2 (Process Operations)**

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the woodworking equipment exhausting through Stack ID BH-1 shall not exceed 18.9 pounds per hour when Line C-6 operates at a process weight rate of 6304 pounds per hour. Line C-1 and C-2 share BH-1 at a process weight rate of 5100 and 5146 pounds per hour, respectively. Since the potential controlled emissions are 0.04 pounds per hour, this process can comply with 326 IAC 6-3-2.
- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse BH-1 shall not exceed 8.85 pounds per hour when Line C-6 is operating at a process weight rate of 6304 pounds per hour.

#### **326 IAC 2-4.1 (Major Sources of Hazardous Pollutants)**

This source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit (PTE) of:

- (a) A single hazardous pollutant (AAP) is less than 10 tons per year, and
- (b) Any combination of HAPs is less than 25 tons per year.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a sources failure to take the appropriate corrective actions within a specific time period.

The woodworking equipment has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the stack exhausts (BH-1) and the baghouse exhaust (SVN) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously normal means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouses for the woodworking processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## Proposed Changes

### SECTION A

### SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

**A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1 (22)]**

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The Permittee owns and operates a stationary wood furniture manufacturing plant.

Responsible Official: Walter B. Woodhams, **President**  
Source Address: 217 East Canal St., Peru, Indiana 46970  
Mailing Address: P.O. Box 848, Peru, Indiana 46970  
SIC Code: 2512  
County Location: Miami  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program Minor Source under PSD Rules  
Major Source, Section 112 of the Clean Air Act

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]**

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This stationary source consists of the following emission units and pollution control devices:

- (a) The following surface coating equipment:
  - (1) One (1) rail stain flowcoater, identified as EU-01G, coating wooden rails with a maximum capacity of 52.5 units per hour, and exhausting to Stack ID SVG.

- (2) One (1) rail spray booth, identified as EU-01H, utilizing an air assisted airless application system, coating wooden rails with a maximum capacity of 52.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVH.
  - (3) One (1) frame stain flowcoater, identified as EU-01I, coating wooden frames with a maximum capacity of 87.5 units per hour, and exhausting to Stack ID SVI.
  - (4) One (1) wipe down area, identified as EU-01N, with a maximum capacity of 87.5 units per hour, and exhausting to general ventilation.
  - (5) One (1) frame sealer spray booth, identified as EU-01J, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVJ.
  - (6) One (1) frame sealer spray booth, identified as EU-01K, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVK.
  - (7) One (1) frame varnish spray booth, identified as EU-01L, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVL.
  - (8) One (1) frame varnish spray booth, identified as EU-01M, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVM.
  - (9) **One (1) dip coating tank, identified as EU-01O, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.**
  - (10) **One (1) dip coating tank, identified as EU-01P, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 80 units per hour, and the emissions are fugitive.**
- (b) Woodworking operations consisting of the following:
- (1) Line C-1, with a maximum capacity of 5100 pounds per hour, which has emissions either controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1, or controlled by one (1) baghouse, identified as BH-2, exhausting to Stack ID BH-2.
  - (2) Line C-2, with a maximum capacity of 5146 pounds per hour, which has emissions controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.
  - (3) Line C-5, with a maximum capacity of 336 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1690, exhausting to general ventilation.



- (4) Line 1735, with a maximum capacity of 4220 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1735, exhausting to general ventilation.
  - (5) Line 1689, with a maximum capacity of 5100 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1689, exhausting to general ventilation.
  - (6) **Line C-6, with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building identified as BH-1.**
- (c) One (1) wood-fired boiler, identified as EU-02, with a heat input capacity of 6.0 million Btu per hour, and exhausting to Stack ID D.

**A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]**

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This stationary source also includes the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

**A.4 Part 70 Permit Applicability [326 IAC 2-7-2]**

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**A.5 Prior Permit Conditions Superseded [326 IAC 2]**

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The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit VOC **and PM** is limited to 246 tons each per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twentyfour (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 41-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

#### C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

#### C.7 Stack Height [326 IAC 1-7] (a)

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description:

- (a) The following surface coating equipment:
- (1) One (1) rail stain flowcoater, identified as EU-01G, coating wooden rails with a maximum capacity of 52.5 units per hour, and exhausting to Stack ID SVG.
  - (2) One (1) rail spray booth, identified as EU-01H, utilizing an air assisted airless application system, coating wooden rails with a maximum capacity of 52.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVH.
  - (3) One (1) frame stain flowcoater, identified as EU-01I, coating wooden frames with a maximum capacity of 87.5 units per hour, and exhausting to Stack ID SVI.
  - (4) One (1) wipe down area, identified as EU-01N, with a maximum capacity of 87.5 units per hour, and exhausting to general ventilation.
  - (5) One (1) frame sealer spray booth, identified as EU-01J, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVJ.
  - (6) One (1) frame sealer spray booth, identified as EU-01K, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVK.
  - (7) One (1) frame varnish spray booth, identified as EU-01L, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVL.
  - (8) One (1) frame varnish spray booth, identified as EU-01M, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVM.
  - (9) **One (1) dip coating tank, identified as EU-01O, utilized a dipping application system, coating wood furniture components with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.**
  - (10) **One (1) dip coating tank, identified as EU-01P, utilized a dipping application system, coating wood furniture components with a maximum capacity of 80 units per hour, and the emissions are fugitive.**

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements for New Facilities), the VOC emissions from the surface coating equipment **EU-01G, EU-01H, EU-01I, EU-01N, EU-01J,**

**EU-01K, EU-01L, and EU-01M** shall be reduced using the best available control technology technology (BACT). Pursuant to PC (52) 1698, BACT is:

- (a) Using air assisted airless spray guns for surface coating.
- (b) That volatile organic compound emissions from the stain shall be limited to 6.8 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.
- (c) That volatile organic compound emissions from the sealer shall be limited to 5.8 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.
- (d) That volatile organic compound emissions from the varnish shall be limited to 5.3 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.

#### **D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]**

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**Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied by emission units EU-01O and EU-01P to wood furniture and cabinets shall utilize one of the following application methods:**

**Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application**

#### **D.1.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

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~~Pursuant to OP-52-06-92-0118, issued on September 6, 1988, the total of all surface coating facilities (EU01G, EU-01H, EU-01I, EU-01J, EU-01K, EU-01L, and EU-01M, EU-01O, and EU-01P)~~ shall use no more than 246 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOC to less than 246 tons of VOC per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### **D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

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Pursuant to 326 IAC 6-3-2(c), the PM from the five (5) spray booths (EU-01H, EU-01J, EU-01K, EU-01L, and EU-01M) and one (1) wipe down area (EU-01N) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### **D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]**

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- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.

- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
  - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
    - (D) Use a combination of (A), (B), and (C).

A copy of this rule is enclosed.

#### D.1.6 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

#### D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and associated control devices.

### **Compliance Determination Requirements**

#### D.1.8 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-2.1.

- (b) If the OAM requests, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

#### **D.1.9 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. ~~IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

#### **D.1.10 HAP Content**

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Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the compliance date specified in Condition D.1.54 and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

#### **D.1.11 Particulate Matter (PM)**

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Pursuant to OP-52-06-92-0118, issued on September 6, 1988, **and in order to comply with D.1.4**, the dry filters for PM control shall be in operation at all times when the five (5) spray booths (EU-01H, EU-01J, EU-01K, EU-01L, and EU-01M) and one (1) wipe down area (EU-01N) are in operation.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.1.12 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.13 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.32, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limits and the VOC usage limits established in Conditions D.1.1 and D.1 32.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;

- (3) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used, compliance shall be based on the volume weighted average VOC content of the coatings used for each day. The volume weighted average VOC content of the coatings shall be determined using the following equation:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [D * O * Q / [1 - W * Dc / Dw]]}{33}$$

Dc = density of coating, lb/gal

Dw = density of water, lb/gal

O = weight percent organics, %

Q = quantity of coating, gal/unit

W = percent volume water, %

C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each day;
- (5) The total VOC usage for each day; and
- (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.54, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.54.
- (1) Certified Product Data Sheet for each finishing material and thinner.
- (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for each finishing material and thinner.
- (3) The VHAP content in weight percent of each thinner used.
- (4) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.65, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.1.1244, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.14 Reporting Requirements

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- (a) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used, a quarterly summary of the information described in Condition D.1.1342,(a)(3) to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

- (b) A quarterly summary of the information to document compliance with Condition D.1.3 2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (c) An Initial Compliance Report to document compliance with Condition D.1.5 4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the compliance date of November 21, 1997. The initial compliance report must include data from the entire month that the compliance date falls.
- (d) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.54, and the Certification form, shall be submitted to the address listed in Section C General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1, through June 30.
  - (2) July 1, through December 31.
- (e) The reports required in (c) and (d) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch-Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590



## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description:

- (b) Woodworking operations consisting of the following:
- (1) Line C-1, with a maximum capacity of 5100 pounds per hour, which has emissions either controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1, or controlled by one (1) baghouse, identified as BH-2, exhausting to Stack ID BH-2.
  - (2) Line C-2, with a maximum capacity of 5146 pounds per hour, which has emissions controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.
  - (3) Line C-5, with a maximum capacity of 336 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1690, exhausting to general ventilation.
  - (4) Line 1735, with a maximum capacity of 4220 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1735, exhausting to general ventilation.
  - (5) Line 1689, with a maximum capacity of 5100 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1689, exhausting to general ventilation.
  - (6) **Line C-6, with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building identified as BH-1.**

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through Stack ID BH-1 shall not exceed ~~40.4~~ **18.9** pounds per hour when Line C-1 is operating at a process weight rate of 5100 pounds per hour, ~~and~~ Line C-2 is operating at a process weight rate of 5146 pounds per hour, **and Line C-6 is operating at a process weight rate of 6304 pounds per hour.**
- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through Stack ID BH-2 shall not exceed 4.82 pounds per hour when Line C-1 is operating at a process weight rate of 5100 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1690 shall not exceed 1.24 pounds per hour when Line C-5 is operating at a process weight rate of 336 pounds per hour.

- (d) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1735 shall not exceed 6.76 pounds per hour when Line 1735 is operating at a process weight rate of 4220 pounds per hour.
- (e) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1689 shall not exceed 7.68 pounds per hour when Line 1689 is operating at a process weight rate of 5100 pounds per hour.
- (f) **Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse BH-1 shall not exceed 8.85 pounds per hour when Line C-6 is operating at a process weight rate of 6304 pounds per hour.**

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.2 Opacity

Pursuant to OP-52-06-92-0118, visible emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

### **Compliance Determination Requirements**

#### D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts (BH-1 and BH-2) shall be performed during normal daylight operations when exhausted to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed. **Failure to take response steps in accordance with Section C - Preventive Maintenance Plan - Failure to Take Proper Steps, shall be considered a violation of this permit.**

#### D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) ~~For multi-compartment units, t~~ The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) Within eight (8) **business** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) **business** hours of discovery of the failure and shall include a timetable for completion. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Responses Steps, shall be considered a violation of this permit.**

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the stack exhausts (BH-1 and BH-2) and the baghouse exhausts (SP-1689, SP-1690, and SP-1735).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Woodcrest Manufacturing  
Source Address: 217 East Canal Street, Peru, Indiana 46970  
Mailing Address: P.O. Box 848, Peru, Indiana 46970  
Part 70 Permit No.: T103-6060-00016  
Administrative No.: AAT-103-10252-00016  
Facility: Facility-wide  
Parameter: VOC emissions  
Limit: 246 tons per 12-consecutive month period, rolled on a monthly basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 103-12741-00016.